

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

CHRISTIE ANDREWS

PLAINTIFF,

v.

**TRI STAR SPORTS AND
ENTERTAINMENT GROUP, INC.,**

DEFENDANT.

Case No. 3:21-cv-00526

Judge Eli J. Richardson

Magistrate Judge Jefferey S. Frensley

**NOTICE OF PLAINTIFF'S
EVIDENTIARY SUBMISSION RE: DE# 19**

Exhibit Number	Description
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Exhibit 1: 2020.01.12 D's E-mail From: Betsy Hart "agree to the revised definitions"

Exhibit 2: 2021.10.29 P's E-mail From: Daniel Arciniegas attached Plaintiff's 1st Set of Discovery

Exhibit 2-1: Plaintiff's 1st of Requests for Production

Exhibit 2-2: Plaintiff's 1st of Interrogatories

Exhibit 3: 2021.12.28 D's E-mail From: Betsy Hart "protective order in place before it can produce documents"

Exhibit 4: 2022.01.06 D's E-mail From: Betsy Hart "need the protective order to include highly confidential/attorneys' eyes only designation, in addition to the standard confidential designation"

Exhibit 4-1: 2022.01.06 D's Proposed Protective Order including "Highly Confidential/Attorney's Eyes Only" Definitions.

Exhibit 5: 2022.01.07 D's E-mail From: Betsy Hart serving objections and responses to discovery requests

Exhibit 6: 2022.01.10 P's E-mail From: Daniel Arciniegas revised definitions and objections

Exhibit 7: 2022.01.28 P's E-mail From: Daniel Arciniegas object showing documents to

plaintiff and potential witnesses

Exhibit 8: 2022.02.08 D's E-mail From: Betsy Hart “attached a revised protective order that does not include highly confidential designation, since at this time, we do not plan to produce any documents that would fall into that category

Exhibit 9: 2022.02.09 P’s E-mail From: Daniel Arciniegas requesting supplement of production to narrow dispute

Exhibit 10: 2022.02.09 P's E-mail From: Daniel Arciniegas objecting to Defendant’s definition, challenge mechanism, witness definition and precondition of signed agreement



Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2022, I filed the foregoing NOTICE OF PLAINTIFF'S EVIDENTIARY SUBMISSION via the Court's electronic filing system, which will automatically send electronic notice of such filing on the following counsel of record for Defendant:

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